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8 Counsel for Defendant BOHANNON

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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.
17 WESLEY STEVEN BOHANNON,
18 Defendant.

Case No.: CR 2019-39 CRB

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE DEADLINES**

20

21 Defendant Wesley Bohannon is currently scheduled to file a motion to compel
22 tomorrow, June 17, 2020, regarding documents subpoenaed from the National Center for
23 Missing and Exploited Children (NCMEC). Although the defense and NCMEC previously
24 believed they were at impasse and set a briefing schedule on the matter, NCMEC's counsel
25 contacted the defense yesterday, June 15, 2020, to propose further productions of documents
26 and compromises in an effort to avoid litigating the motion to compel. The defense, with
27 NCMEC's support, therefore requests a continuance on the deadline to file a motion to compel
28

1 until July 15, 2020. Extending the deadline will conserve the Court's resources, as well as
2 those of the parties and third-party NCMEC. The government does not oppose this request.
3

4 Given ongoing negotiations, the defense and the government agree that granting an
5 exclusion of time would allow the reasonable time necessary for effective preparation of
6 counsel, 18 U.S.C. § 3161(h)(7)(B)(iv), and that the ends of justice served by granting such an
7 exclusion outweigh the best interest of the public and the defendant in a speedy trial, 18 U.S.C.
8 § 3161(h)(7)(A), from June 16, 2020, through July 15, 2020.

9 IT IS SO STIPULATED.

10 Dated: June 16, 2020
11 Respectfully submitted,
12 STEVEN G. KALAR
Federal Public Defender
Northern District of California

13 /S
14 DAVID RIZK
Assistant Federal Public Defender
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17 Dated: June 16, 2020
18 DAVID L. ANDERSON
United States Attorney
Northern District of California
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20 /S
21 DAN KARMEL
Assistant United States Attorney
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24 IT IS SO ORDERED.
25 _____
26 Dated
27
28 _____
CHARLES R. BREYER
Senior United States District Judge